Case 16-330246-100741-1008 2500FAG FINABALOG21 FLOTE FOR TENDER PROPER OF 41-5084: The solenaged CERP ROBER PROPER OF 45 COURT FOR THE COURT F

Denise Carlon, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532 (856) 858-3242 Attorneys for Embrace Home Loans, Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

In Re:
Debra A. Rice

Case No.: 16-10241 JNP

Judge: Jerrold N. Poslusny Jr.

### ORDER ALLOWING FILING OF CLAIM

The relief set forth on the following page is hereby ordered **ORDERED**.

DATED: November 15, 2016

Honorable Jerrold N. Poslusny, Jr. United States Bankruptcy Court

# 

Upon the motion of Embrace Home Loans, Inc. to Allow the filing of a Proof of Claim as to certain property as hereinafter set forth, and for cause shown, it is

**ORDERED THAT:** Movant is hereby granted approval to file a Proof of Claim with regard to the following:

Real Property More Fully Described as:
Land and premises commonly known as 109 Emerald Ave, Haddon Township, NJ 08108
Personal Property More Fully Describes as:

The movant shall serve this order on the debtor, any trustee and any other party who entered an appearance on the motion.

## Case 16-350246-100741-1008 2500FAG FINARUS 21 FINARUS 21 FINARUS 3 FOR SERPARUS 6 FINARUS 6 FINA

Denise Carlon, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532 (856) 858-3242 Attorneys for Embrace Home Loans, Inc.

IN THE MATTER OF:

Debra A. Rice

DEBTOR

#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

CHAPTER 13 CASE NO. 16-10241 JNP

NOTICE OF MOTION TO ALLOW CLAIM

#### MOTION OF Embrace Home Loans, Inc. TO ALLOW CLAIM

Movant, by and through its Attorney, KML Law Group, P.C., hereby brings this Motion to Allow Claim and in support thereof avers the following;

- 1. Movant is Embrace Home Loans, Inc.
- 2. Movant is the holder of a secured claim in the above referenced matter.
- 3. Movant has prepared a proof of claim for filing, setting forth pre-petition arrears in the amount of \$3,813.45. A copy of the proposed proof of claim is attached as Exhibit "A" hereto.
  - 4. The bar date for filing claims was May 04, 2016.
- 5. The Debtor's confirmed plan provides for payment of arrears to the Movant in the amount of \$8,143.52.
  - 6. There will be no prejudice to the Debtor if the Motion to Allow Filing of Claim is allowed.

WHEREFORE, Movant respectfully requests that this Court enter an Order allowing the filing of a Proof of Claim.

Date: October 21, 2016

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire KML Law Group, P.C. Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532 (215) 627-1322 FAX (215) 627-7734 Attorney for Movant/Applicant

## Case 16-10241-JNP Doc 25 Filed 11/18/16 Entered 11/19/16 00:41:08 Desc Imaged

Certificate of Notice Page 4 of 4
United States Bankruptcy Court
District of New Jersey

In re: Debra A Rice Debtor Case No. 16-10241-JNP Chapter 13

#### CERTIFICATE OF NOTICE

District/off: 0312-1 User: admin Page 1 of 1 Date Rcvd: Nov 16, 2016 Form ID: pdf903 Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 18, 2016.

db +Debra A Rice, 109 Emerald Avenue, Westmont, NJ 08108-2401

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. NONE.  $\,$  TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 18, 2016 Signature: /s/Joseph Speetjens

#### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 16, 2016 at the address(es) listed below:

Denise E. Carlon on behalf of Creditor Embrace Home Loans, Inc. dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com

Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com

Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com

Joel R. Spivack on behalf of Debtor Debra A Rice joel@spivacklaw.com, admin@spivacklaw.com Joshua I. Goldman on behalf of Creditor Embrace Home Loans, Inc. jgoldman@kmllawgroup.com,

bkgroup@kmllawgroup.com

TOTAL: 5